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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

WINERTHAN CHIU,) NO. C14-1607-JSW
Plaintiff,)
v.) STIPULATED REQUEST FOR
) CONDITIONAL DISMISSAL AND
) PROPOSED ORDER
UNITED STATES OF AMERICA, et. al.,)
Defendant.)
)

It is hereby Stipulated and Agreed by the parties herein as follows:


1. The parties hereto, through their respective counsel, are advising this Court that they have agreed to a settlement of this action.
2. The terms of the settlement involve consideration that will take between 60 to 90 days to deliver.
3. Accordingly, the parties request that this action be dismissed with prejudice and that all dates be vacated provided, however, that if either party certifies to this Court, with a proof of service of a copy on opposing counsel, within 90 days from the date of the Order of Dismissal, that the agreed

1 consideration for the settlement has not been delivered over, that the Order of Dismissal shall stand
2 vacated, and the action be restored to the calendar to be set for a case management conference.

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4 SO STIPULATED

MELINDA HAAG
United States Attorney

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6 /s/ Cynthia Stier 
7 CYNTHIA STIER
8 Assistant United States Attorney

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10 NEIL P. CHERUBIN
11 Attorney for Winethan Chiu

12 SO ORDERED this 27th day of October, 2014.

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15 JEFFREY S. WHITE
16 UNITED STATES DISTRICT JUDGE
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